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Attorneys for Defendant  
ViSalus, Inc.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

LORI WAKEFIELD, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

VISALUS, INC., a Nevada corporation,

Defendant.

No. CV No. 3:15-cv-01857-SI

**DEFENDANT'S UNOPPOSED MOTION  
FOR AN EXTENSION OF TIME TO  
OCTOBER 15 TO FILE OPPOSITIONS TO  
PLAINTIFF'S (1) CLASS NOTICE  
PROPOSAL AND (2) MOTION FOR  
ATTORNEYS' FEES & INCENTIVE  
AWARD**

### **LOCAL RULE 7-1 CERTIFICATION**

Counsel for Defendant ViSalus conferred with Counsel for Plaintiff Wakefield, and Plaintiff's counsel consented to the extensions requested here.

### **MOTION FOR EXTENSIONS OF TIME**

Currently pending are Plaintiff's motion for attorneys' fees and an incentive award (Dkt. 388; opposition due October 8, 2020) and Plaintiff's motion for approval of post-judgment notice plan and claims procedure (Dkt. 396; opposition due October 9, 2020).

In light of the parties' October 5 mediation session, and to better coordinate the post-judgment proceedings and briefing, ViSalus moves to extend its opposition deadlines to October 15.

On September 29, ViSalus requested that Plaintiff agree to these extensions and Plaintiff's counsel so agreed.

Good cause exists for these extensions to allow ViSalus' counsel to address the numerous issues raised in Plaintiff's voluminous motions. These extensions will not impact other existing deadlines and are not sought for purposes of delay.

Dated: October 5, 2020

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

By s/Benjamin G. Shatz

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